



California Regional Water Quality Control Board
Central Valley Region
Katherine Hart, Chair



Matthew Rodriguez
Secretary for
Environmental Protection

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Edmund G. Brown Jr.
Governor

12 January 2012

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Stockton, CA 95219

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MLJ-LLC
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**ROBERTS ISLAND WATER QUALITY MONITORING LOCATION SITE EXCHANGE
– SAN JOAQUIN COUNTY AND DELTA WATER QUALITY COALITION**

Thank you for submitting the 1 December 2011 request to modify the San Joaquin County and Delta Water Quality Coalition (Coalition) Monitoring and Reporting Program Plan. The request proposes to exchange a monitoring site identified as Roberts Island at Whiskey Slough Pump for the two current sites: Roberts Island Drain along House Road and Roberts Island Drain at Holt Road. The Coalition's letter and a subsequent phone conversation supports the request, which indicates that the Roberts Island at Whiskey Slough Pump site is more representative of the island's discharges than the other two sites combined.

Staff has reviewed the land use maps and other information provided by the Coalition. Staff found that the Roberts Island at Whiskey Slough Pump site is better suited to represent irrigated agriculture on the island because the new sample point is near the island's discharge point to the San Joaquin River. The former sites are up gradient and do not allow the Coalition to successfully identify sources of exceedances for management plan implementation.

Therefore, based on information provided in your letter and staff's attached memorandum, I approve the Coalition's request for replacing Roberts Island Drain along House Road and Roberts Island Drain at Holt Road with the Roberts Island at Whiskey Slough Pump site, effective immediately. The approved Roberts Island Drain management plans currently underway must still be fully implemented, although monitoring may be changed to the Whiskey Slough Pump site, where appropriate.

To effectively complete this transition, please submit the following documents by **2 February 2012** to revise your Monitoring and Reporting Program Plan:

- Revisions to the Monitoring and Reporting Program Plan (MRP Plan) Table A, which summarizes all changes to the MRP Plan
- Revisions to the MRP Plan's Tables 4, 6, and 9, which list the Coalition's monitoring sites or schedules

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If you have any questions or comments regarding the site exchange approval, please contact Chris Jimmerson at (916) 464-4859.


for Pamela C. Creedon
Executive Officer



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TO: Susan Fregien
Senior Environmental Scientist
Monitoring and Implementation Unit
Irrigated Lands Regulatory Program

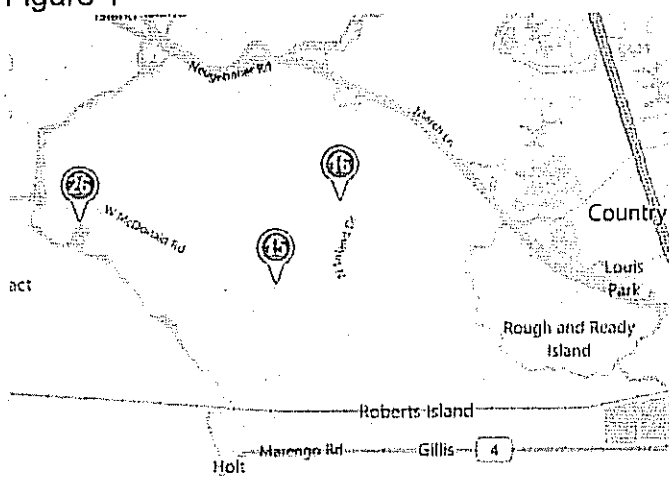
FROM: Chris Jimmerson
Environmental Scientist
Monitoring and Implementation Unit
Irrigated Lands Regulatory Program

DATE: 19 December 2011

SUBJECT: REQUEST TO MODIFY ROBERTS ISLAND MONITORING SITE – SAN JOAQUIN COUNTY AND DELTA WATER QUALITY COALITION

The California Regional Water Quality Control Board, Central Valley Region, (Central Valley Water Board) received a request from the San Joaquin County and Delta Water Quality Coalition (Coalition) on 1 December 2011 to modify its Monitoring and Reporting Program Plan and Management Plan. The request proposes to exchange current monitoring sites Roberts Island Drain along House Road (see Fig. 1, Pt. 16) and Roberts Island Drain at Holt Road (see Fig. 1, Pt. 15) for Roberts Island at Whiskey Slough Pump (see Fig. 1, Pt. 26). The proposed site is better suited to represent agriculture on the island. In addition to the Coalition's letter, staff received additional information in a 19 December Coalition phone call.

Figure 1



Roberts Island receives its irrigation water through Black Slough at the northern end of the island, distributing irrigation water through meandering constructed agriculture drains. Replacing the existing monitoring sites with a single down-gradient monitoring

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site will increase the acreage being represented from 2,300 acres to 11,700 acres. The current monitoring sites have unpredictable directional flow shifts from pumping that complicate the Coalition's exceedance sourcing efforts in the upper watershed. The current monitoring sites are upgradient of the proposed monitoring site. Therefore, the down-gradient Whiskey Pump site will capture drainage from both the current sites, plus additional irrigated land not previously represented.

Highway 4 hydrologically bisects the island separating north of Highway 4 from south of Highway 4. North of Highway 4 is the island boundary that the Coalition's monitoring is designed to represent. The island is a typical Delta island - it is below sea level and behaves similar to a sink-basin.

There are only two pumping stations that drain water off the island north of Highway 4. The first pump is on the western side near the proposed monitoring site at Whiskey Slough (see Fig. 1, Pt. 26). The second pump is on the northeastern side. The second pump only operates when the drainage exceeds the first pump's ability to discharge water off the island - a very rare occurrence. Without the pumps, the levees contain the water within the island's hydrologic confines. The drainage eventually flows to the San Joaquin River and Empire Cut. Since the western pump is the main discharge point, staff concurs with the Coalition that placement of the proposed site here will represent any island discharge much better than the current sites that were placed near the middle of the island. It will also facilitate the Coalition's efforts with sourcing exceedances and implementing management practices.

The current sites have management plans for chlorpyrifos, diuron, *C. dubia*, *H. azteca*, and *S. capricornutum*. The Coalition will transfer the management plans currently underway to the replacement site because the Whiskey Slough Pump site still represents exceedances observed in the upper watershed. The proposed site will become a High Priority Management Plan site in 2013. In addition, the Whiskey Slough Pump site will be the new Core/Assessment site for Zone 4. Monitoring will be initiated in January 2012.